

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Jay Quigley v. Pappoosha et al.

Quigley · No. 3:25-CV-1822 (SVN) · Decided December 9, 2025

SUMMARY

The United States District Court for the District of Connecticut denies inmate Jay Quigley's motion to proceed in forma pauperis under 28 U.S.C. § 1915. The court finds that his trust account balance and deposits were sufficient to pay the \$402 filing fee without forcing him to forgo life's necessities. Proceedings are held in abeyance for 30 days, with dismissal to follow if the filing fee is not paid by January 9, 2026.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Sarala V. Nagala
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	December 9, 2025
DOCKET	3:25-CV-1822 (SVN)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a self-represented incarcerated person, moved for leave to proceed in forma pauperis in a civil-rights action under 42 U.S.C. § 1983.
STANDARD OF REVIEW	The decision whether to permit a civil litigant to proceed in forma pauperis is committed to the sound discretion of the district court.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status unknown.
PARTIES	Jay Quigley v. Pappoosha et al.

TOPICS

- civil procedure
- prisoners rights

PRACTICE AREAS

- civil procedure
- prisoner civil rights

QUESTIONS PRESENTED

1. Whether plaintiff demonstrated that requiring him to pay the \$402 filing fee would prevent him from obtaining the necessities of life or force him to abandon the action.
2. Whether plaintiff should be permitted to proceed in forma pauperis under 28 U.S.C. § 1915.

HOLDINGS

1. Plaintiff was not entitled to proceed in forma pauperis because his trust-account balance and six-month deposit history showed that he could pay the \$402 filing fee without being forced to choose between paying the fee and obtaining the necessities of life.

KEY QUOTATIONS

“In exercising this discretion, the Court must determine whether the burden of paying the fees for filing and service would either hamper the plaintiff’s ability to obtain the necessities of life or force him to abandon the action.” (at 1)

“All litigants must make decisions about how to spend their money when they are contemplating litigation.” (at 2)

“If every inmate were permitted to simply spend funds in the canteen to avoid paying a filing fee, the in forma pauperis review would be a waste of time and effort.” (at 2)

FACTUAL BACKGROUND

Plaintiff was incarcerated within the Connecticut Department of Correction and sought to commence a constitutional-rights action without prepaying the \$402 filing fee. His trust-account statement showed a balance of \$737.75 on October 27, 2025, as well as \$1,787.60 in deposits and credits during the preceding six months. Although plaintiff reported spending approximately \$75 per month on food and coffee, the statement reflected substantially greater commissary spending.

PROCEDURAL HISTORY

Plaintiff filed his complaint on October 29, 2025, along with a motion to proceed in forma pauperis and a trust-account statement. The court denied the motion because plaintiff’s account balance exceeded the filing fee and his deposits and spending history did not show that paying the fee would deprive him of the necessities of life. Further proceedings were held in abeyance for thirty days pending payment of the filing fee.

DISPOSITION

other

CASES CITED

- *Rahimi v. Sec’y of Navy*, No. 3:19-CV-01852 (JAM), 2019 WL 6529458, at *2 (D. Conn. Dec. 4, 2019)
- *Adkins v. E.I. DuPont de Nemours & Co.*, 335 U.S. 331, 339–40 (1948)
- *Potnick v. E. State Hosp.*, 701 F.2d 243, 244 (2d Cir. 1983) (per curiam)

- Nicholas v. Tucker, 114 F.3d 17, 20 (2d Cir. 1997)
- Allen v. Cuomo, 100 F.3d 253, 261 (2d Cir. 1996)
- Zipkin v. Heckler, 790 F.2d 16, 18 (2d Cir. 1986)
- Scott P. v. Kijakazi, No. 3:22-CV-01228, 2022 WL 16640788, at *1 (D. Conn. Oct. 6, 2022)
- Fridman v. City of New York, 195 F. Supp. 2d 534, 537 (S.D.N.Y. 2002)
- Williams v. Spencer, 455 F. Supp. 205, 208–09 (D. Md. 1978)
- Dan M. v. Kijakazi, No. 3:22-CV-00664, 2022 WL 2069112, at *12 (D. Conn. May 19, 2022)
- Pierre v. City of Rochester, No. 16-CV-6428, 2018 WL 10072449, at *1 (W.D.N.Y. Dec. 13, 2018)
- Clark v. Pappoosha, No. 3:21-CV-1690 (CSH), 2022 WL 960296, at *1 (D. Conn. Mar. 30, 2022)
- Brown v. Ruiz, No. 3:20-CV-1202 (KAD), 2020 WL 6395480, at *1 (D. Conn. Nov. 2, 2020)
- Briand v. Florida, No. 4:06CV104-WS, 2006 WL 1890189, at *1 (N.D. Fla. July 10, 2006)